



GARY R. HERBERT  
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Lieutenant Governor

# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
Executive Director

### Division of Oil, Gas and Mining

JOHN R. BAZA  
Division Director

June 1, 2016

Eric York  
Intrepid Potash – Moab LLC  
P.O. Box 1208  
Highway 279 Potash Rd.  
Moab, Utah 84532

Subject: First Review of Amended Notice of Intention to Commence Large Mining Operations, Intrepid Potash – Moab LLC, Cane Creek Mine, M/019/0005, Grand, Utah

Dear Mr. York:

Thank you for submitting updated information associated with the periodic review of the reclamation surety for the Cane Creek mine. The Division of Oil, Gas and Mining has reviewed the amendment which was received on April 19, 2016, and the attached comments need to be addressed.

The comments are listed under the applicable Minerals Rule heading; please format your response in a similar fashion. Please address only those items requested in the attached technical review by sending replacement pages for the original Notice of Intention to Commence Large Mining Operations (Notice) using redline and strikeout text. After the amendment is determined technically complete, the Division will ask that you submit two clean copies. Upon final approval, both copies will be stamped approved and one will be returned for your records.

Please submit your response to this review by **July 1, 2016**. The Division will suspend further review until receiving your response. Please contact the lead for this project, Mike Bradley, at 801-538-5332, or me at 801-538-5261 if you have questions about the review or if you would like to schedule a meeting to discuss the comments. Thank you for your cooperation in completing this permitting action.

Sincerely,

Paul B. Baker  
Minerals Program Manager

PBB: mpb: eb

Attachment: Review comments; DEQ hazardous waste management information  
cc: Woody Campbell, UDWQ (wwcampbell@utah.gov)

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**FIRST REVIEW OF NOTICE OF INTENTION  
TO COMMENCE LARGE MINING OPERATIONS  
Intrepid Potash – Moab LLC  
Cane Creek Mine  
M/019/0005  
May 31, 2016**

**General Comments:** (No specific responses required.)

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
1	General	Please develop maps, figures and text with the understanding that they must be scanned and photocopied. This will require that hatching, line weights, colors, map labels, and text formatting be clear and legible when digitally copied.	OGM	
2	General	Responses to the following review comments may raise additional questions and generate subsequent comments by Division personnel.	OGM	
3	General	Submittal should be formatted to easily incorporate additional revisions and amendments.	OGM	
4	General	While developing reclamation cost estimates, the Division must assume the site will be left in a worst-case scenario with the Division having to conduct the reclamation with State-approved contractors in the absence of the operator. Please develop the reclamation cost estimate with this understanding.	OGM	
5	General	The reclamation cost estimate must take into account compliance with all applicable rules and regulations pertaining to worker health and safety and the remediation, handling and disposal of regulated hazardous wastes. The Division is not exempt from complying with these statutes in the event it must undertake the reclamation.	OGM	

**R647-4-113 – Surety**

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
6	General Comment on Cash Surety	All operators that want to provide a cash surety must also provide an accurately completed <b>IRS Form W-9</b> with their cash deposit. The bank where the State Treasurer will deposit the cash must approve and accept the W-9 prior to the Division granting final approval of the permit. (No specific response required.)	OGM	
7	Omission	A pre-demolition asbestos inspection survey of all buildings will be required prior to removal in accordance with R307-801-9 to determine the presence and amounts of asbestos-containing building materials (ACBM) typically associated with building systems and used in building construction. Include costs for conducting pre-demolition building inspections as required by the Utah Division of Air Quality to identify any hazardous building materials and universal hazardous wastes as required in UAC R307-801-9. The Division recommends adding a 10 percent contingency to the total demolition cost for each building to cover the building inspection, abatement, and disposal of regulated hazardous wastes.	mb	
8	Omission	Please update the surface facilities map so that each building is named or numbered so it can be cross referenced with the reclamation cost estimate and Table 110-2. This information is needed so that the Division can determine if all the facilities on the maps are accounted for in the bond calculations.	whw	



First Review  
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M/019/00005  
June 1, 2016

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
9	Cover letter	The introductory letter says some items have been demolished and removed. The Division cannot remove those items from the bond calculations unless there has been a formal bond release request. Please submit a partial bond release request.	whw	
10	Cover letter	The introductory letter says some items have been added to the mine. New structures can only be added when the NOI has been amended. Please make sure that the NOI has been updated to contain the new information.	whw	
11		Demolition cost sheets – Please list the structure to which the sheet pertains to. This information is needed so that a reviewer can easily determine what item they are reviewing.	whw	
12		Disposal of demolition debris – On page 34 under STRUCTURE DEMOLIITON, the NOI says all structures and ancillary equipment will be demolished and deposited in a one-time-use, Class Iva, demolition landfill. Please clarify if the landfill currently exists on site or if the permit could be used by a third party contractor, i.e. someone contracted by the Division, to dispose of debris.	whw	
13		Please submit backup calculations for the amount of time spent for earthwork items.	whw	